

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Marina Moraru
Special Assistant Corporation Counsel
Office: (212) 356-2456

VIA ECF

Hon. Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

July 20, 2023

Re: F.T. v. N.Y.C. Dep't of Educ., 23-cv-1723 (RA)(VF)

Dear Judge Abrams:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks an extension of the implementation deadline for use of tutoring services (and enforcement of the settlement agreement), as well as attorneys' fees and costs incurred for legal work implementing the settlement agreement in Case# 206467 in this action.

I write jointly with Plaintiff to respectfully request a stay of this action, with a status letter due on August 18, 2023. Defendant's deadline to respond to the Complaint is currently July 24, 2023. Plaintiff consents to this request. Your Honor granted Defendant's first request for an extension on March 22, 2023 (ECF No. 9), and the second request on June 21, 2023 (ECF No. 14). Plaintiff's counsel is considering a forthcoming settlement demand for the extension of the implementation deadline, and informed me that the delay is due to his recent travels abroad. The parties are both working to obtain and exchange additional information on the relevant facts which will inform settlement. The requested stay will allow the parties to continue the settlement discussions, and hopefully resolve the matter without the need to burden the court with any sort of motion practice, conferences or even the need to file an Answer. The parties are optimistic that a resolution can be reached without the need for further Court intervention.

Therefore, Defendant respectfully requests that the matter be stayed, with a joint status letter due by August 18, 2023 informing the Court on the status of settlement discussions.

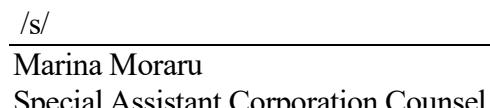
Thank you for considering these requests.

Application granted. This action is hereby stayed. The parties shall file a joint status letter no later than August 18, 2023.

SO ORDERED.


Hon. Ronnie Abrams
United States District Judge
07/21/2023

Respectfully submitted,


/s/
Marina Moraru
Special Assistant Corporation Counsel

cc: William DeVinney (via ECF)